



Competitive Carriers Association
Rural • Regional • Nationwide

Competitive Carriers Association
805 15th Street NW, Suite 401
Washington, DC 20005
Office: (202) 449 -9866 • Fax: (866) 436 -1080

September 28, 2012

Via ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WT Docket No. 12-69

Dear Ms. Dortch:

On September 27, 2012, Steven Berry, Tim Donovan and I met with David Goldman, Senior Legal Advisor to Commissioner Jessica Rosenworcel, to discuss the Commission's Interoperability Notice of Proposed Rulemaking.¹ The record in this proceeding proves that a single band class, Band Class 12, would not cause harmful interference to Lower 700 MHz B and C block licensees² and that an interoperability requirement is necessary to obtain affordable advanced mobile devices to deploy service to consumers in smaller, regional, and rural service areas.³

CCA urged prompt action on its petitions⁴ requesting the Commission to adopt appropriate conditions in the event it grants AT&T's proposed acquisitions from Triad 700, LLC and CenturyTel Broadband Wireless, LLC, and to consolidate these proceedings with AT&T's pending applications that seek approval for additional spectrum acquisitions. In light of the substantial spectrum aggregation and spectrum scarcity concerns that already are impeding competition in the wireless marketplace and the exacerbating effects of AT&T's latest proposed acquisitions, particularly with respect to the lack of interoperability in the Lower 700 MHz spectrum, the Commission should comprehensively examine all pending and future transfer or assignment applications in which AT&T seeks to acquire additional spectrum.

¹ Promoting Interoperability in the 700 MHz Commercial Spectrum, Notice of Proposed Rulemaking, WT Docket No. 12-69 (rel. Mar. 21, 2012) ("*Interoperability NPRM*").

² *Interoperability NPRM* ¶ 30.

³ *Interoperability NPRM* ¶ 21.

⁴ See Petition of RCA – The Competitive Carriers Association for Conditions and Consolidated Treatment, *AT&T Mobility Spectrum LLC and Triad 700, LLC Seek Consent to the Assignment of 27 Lower 700 MHz Band B Block Licenses*, ULS File No. 0005286787 (filed Aug. 15, 2012); Petition of Competitive Carriers Association for Conditions and Consolidated Treatment, *AT&T Mobility Spectrum LLC and CenturyTel Broadband Wireless, LLC Seek FCC Consent to the Assignment of Lower 700 MHz Band and AWS-1 Licenses*, ULS File No. 0005337520 (filed Sept. 25, 2012).

This *ex parte* notification is being filed electronically with your office pursuant to Section 1.1206 of the Commission's Rules.

Sincerely,

/s/

Rebecca Murphy Thompson
General Counsel

cc (via email): Mr. David Goldman